



**Matthew Rodriguez**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Miriam Barcellona Ingenito  
Acting Director  
1001 "I" Street  
P.O. Box 806  
Sacramento, California 95812-0806



**Edmund G. Brown Jr.**  
Governor

November 25, 2014

Mr. Enrique Manzanilla  
Director, Superfund Division  
United States Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, California 94105

### **PETITION TO CONDUCT A PRELIMINARY ASSESSMENT OF HAZARDOUS SUBSTANCE RELEASES IN THE NORTH ORANGE COUNTY BASIN GROUNDWATER PLUME AREA**

Dear Mr. Manzanilla:

Under the authority of Section 105(d) of the Comprehensive Environmental Response, Liability, and Compensation Act, as amended (CERCLA), the Department of Toxic Substances Control (Department) hereby requests that Region 9 of the United States Environmental Protection Agency (U.S. EPA) conduct a preliminary assessment of the releases of hazardous substances in the North Orange County Groundwater Basin (North Basin). The North Basin supplies water to 22 cities and approximately 2.4 million residents of California. The location of the releases can be described generally within a groundwater contaminant plume area approximately four miles long and two miles wide, and includes smaller co-mingled or isolated plumes. The larger contaminant plume area is depicted on the map enclosed hereto as Exhibit A.

Within the larger contaminant plume area, it is believed that industrial businesses released hazardous substances, most importantly volatile organic compounds (VOCs), in the shallower aquifer. These facilities are believed to have contributed to the following releases:

**Plume 1:** This area is bounded by Highland Avenue to the east, Commonwealth to the north, Valencia to the south, and Woods Street to the west. This is the westernmost plume. Fullerton Manufacturing is located towards the eastern boundary of the plume.

**Plume 2:** This area is bounded by Acacia to the east, Orangethorpe Avenue to the south, Commonwealth to the north, and Harbor Boulevard to the west. This is the largest plume. The sites that are part of the State's evaluation are CBS/Fender, MAG Aerospace, and Chicago Musical Instruments.

Mr. Enrique Manzanilla  
November 25, 2014  
Page 2

**Plume #3:** This area is bounded by the 57 Freeway to the east, Kimberly to the south, State College to the west, and Valencia to the north. The sites being evaluated by the State include Aerojet, Alcoa, and Mark VI.

**Plume #4:** This area is bounded by Walnut Via to the east, Orangethorpe to the south, halfway west between Harbor and Lemon, and Balcom Avenue to the north. The sites being evaluated by the State include Northrop Y-12, Moore Wallace, and Kester Solder.

**Plume #5:** This area is bounded by Acacia to the east, Orangethorpe to the south, Raymond Avenue to the west, and Kimberly to the north. The sites being evaluated by the State include Arnold Engineering.

**Plume #6:** This area is bounded by Acacia to the west, State College to the east, Kimberly to the north, halfway south between Orangethorpe and the 91 freeway. The sites being evaluated by the State include Crucible Material.

As Trustee for natural resources within its purview, including the waters of the State, the Department has responsibility for the protection of the waters of the State in the North Basin. The Department is therefore affected by the subject hazardous substance releases, which threaten a significant portion of the groundwater resources in the North Basin.

The Department and the California Regional Water Quality Control Board for the Santa Ana Region are actively involved in investigation and remediation of hazardous substance releases in the North Basin groundwater contaminant plume area. However, it is clear that the magnitude of the hazardous substance releases involved, and the threats that they pose to the public health and welfare, and to the environment, warrant consideration for the National Priorities List. Therefore, the State agencies believe that the U.S. EPA should assume responsibility for response actions in the North Basin under the authority of CERCLA, in coordination with the affected State agencies and the Orange County Water District.

Please feel free to contact me at (916) 324-3148 if you have any questions.

Sincerely,



Stewart W. Black, P.G.  
Deputy Director  
Brownfields and Environmental Restoration Program

Enclosure

cc: See next page.

Mr. Enrique Manzanilla  
November 25, 2014  
Page 3

cc: (sent via email)

Mr. John Lyons  
Acting Assistant Director  
U.S. Environmental Protection Agency-Region 9  
75 Hawthorne Street  
San Francisco, California 94105  
[Lyons.John@epa.gov](mailto:Lyons.John@epa.gov)

Mr. Kurt Berchtold  
Santa Ana Regional Water Quality Control Board-Region 8  
3737 Main Street, Suite 500  
Riverside, California 92501  
[Kurt.Berchtold@waterboards.ca.gov](mailto:Kurt.Berchtold@waterboards.ca.gov)

Michael R. Markus  
General Manager  
Orange County Water District  
18700 Ward Street  
Fountain Valley, California 92708  
[mmarkus@ocwd.com](mailto:mmarkus@ocwd.com)

Mr. Steve Koyasako  
Assistant Chief Counsel  
Office of Legal Affairs  
Department of Toxic Substances Control  
1001 I Street  
Sacramento, California 95814  
[Steve.Koyasako@dtsc.ca.gov](mailto:Steve.Koyasako@dtsc.ca.gov)

Ms. Barbara Cook  
Division Chief  
Brownfields and Environmental Restoration Program  
Department of Toxic Substances Control  
700 Heinz Street  
Berkeley, California 94710  
[Barbara.Cook@dtsc.ca.gov](mailto:Barbara.Cook@dtsc.ca.gov)